



P.O. DRAWER N 9453 '99 APR 21 10:23  
FM 563 AT BELTON LANE  
ANAHUAC, TEXAS 77514

April 16, 1999

Dockets Management Branch (HFA 305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

RE: Docket Number 98P-0504

Dear FDA:

I am writing today to express my strong objection to costly and unnecessary rules which you have been asked to consider by the Center for Science in the Public Interest.

As one who has worked with the oyster industry for many years, I can tell you first hand of the economic damage these proposed rules would inflict upon us. Reduced demand would result in reduced activity in the industry. This would reduce fuel and equipment purchases by harvesters, container purchases by shippers and processors, the need for common carrier distributors, and would reduce business and income throughout the chain from harvester to retail outlets.

The ripple effect of these proposed rules would have economic impact far beyond any benefit that would occur as a result of their imposition on the industry. Consumers should have a choice between treated oysters and fresh oysters. The small number of people who may be at real risk should heed the ample health warnings available where fresh oysters are sold and assume their own level of personal responsibility just as those who are diabetic must avoid sugar and those who are allergic to sulfites must avoid products which contain them. These products are not removed from the market or treated to eliminate sulfites, consumers are advised that they should not consume them.

I urge FDA to reject these crippling rules and allow other appropriate independent state and national bodies such as the ISSC to continue their educational and oversight activities as they have in the past.

Sincerely,

Kenneth D. Moore  
President & CEO

KDM/pw

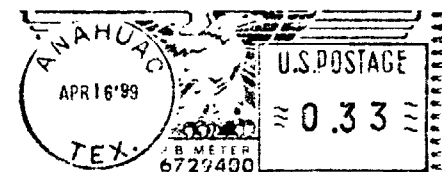
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PHONE: 409-267-3106

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